



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 4, 2020

By Email and ECF

Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
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Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

This discovery is only being provided to Huawei Technologies Co., Ltd. and Huawei Device USA Inc. Although Huawei Device Co. Ltd. and Futurewei Technologies, Inc. are newly indicted defendants in this case, neither is entitled to this discovery both because they have not yet appeared in the case and because they are not a party to the protective order.

I. The Government's Discovery

| Document Description | Category of Discovery Pursuant to Protective Order | Bates Range |
|---|---|---|
| Documents Associated with Requests Made to the Defendants by U.S. Government Agencies | Discovery Material | DOJ_HUAWEI_B_0000005756 - DOJ_HUAWEI_B_0000005787 |
| Financial Institution Document | Discovery Material | DOJ_HUAWEI_B_0000005788 |
| Documents Related to Activities in Iran | Discovery Material | DOJ_HUAWEI_B_0000005789 - DOJ_HUAWEI_B_0000005803 |
| | Sensitive Discovery Material | DOJ_HUAWEI_B_0000005804 - DOJ_HUAWEI_B_0000006921 |
| Documents Related to Shipping | Discovery Material | DOJ_HUAWEI_B_0000006922 - DOJ_HUAWEI_B_0000006938 |
| Defendants' Presentation to a U.S. Government Agency | Discovery Material | DOJ_HUAWEI_B_0000006939 - DOJ_HUAWEI_B_0000006960 |
| Information Related to the Entity List | Discovery Material | DOJ_HUAWEI_B_0000006961 - DOJ_HUAWEI_B_0000006982 |
| Corporate Record | Discovery Material | DOJ_HUAWEI_B_0000006983 |
| Public News Article | Discovery Material | DOJ_HUAWEI_B_0000006984 - DOJ_HUAWEI_B_0000006996 |
| Documents Related to Shipping | Discovery Material | DOJ_HUAWEI_B_0000006997 - DOJ_HUAWEI_B_0000006998 |
| Document Related to Syria | Discovery Material | DOJ_HUAWEI_B_0000006999 - DOJ_HUAWEI_B_0000007000 |
| Corporate Records | Discovery Material | DOJ_HUAWEI_B_0000007001 - DOJ_HUAWEI_B_0000007080 |

Very truly yours,

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cc: Clerk of the Court (AMD) (by ECF)